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PINE VALLEY, CA 91912

Rob Hingstgen

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RECEIVED Mr. Mark WARDEN
DIRECTOR / SD COUNTY PLANNING
5510 OVERLAND AVE., # 310
SAN DIEGO, CA 92123

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Planning and
Development Services

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February 20, 2014

Attn: Mark Wardlaw, Ashley Gungle, Darren Gretler, & Robert Hingtgen
County of San Diego/ Department of Planning and Development
5510 Overland Ave., St 310
San Diego, CA 92123

**Re: Notice of Preparation for a Programmatic Environmental Impact
Report for the Soitec Solar Projects**

**SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT, LOG
NO. PDS2012-3910- 120005 (ER); 3800-12-010 (GPA); TIERRA DEL SOL, 3300-12-010
(MUP); 3600-12-005 (REZ); 3921-77-046-01 (AP); RUGGED SOLAR, 3300-12-007 (MUP);
SCH NO. 2012121018**

The intent of our letter, is to provide comments on this proposed project to you, the EIR lead agency that help make environmentally sound decisions for the County of San Diego. This project has the ability to dramatically change the local area in many ways. Subjects of concern are included as topic areas reviewed from the EIR. As local land owners, our perspective (if we can be so bold) includes critical areas of concern that may not be found directly in the subjects to be evaluated. Therefore, the following is intended to give you, the lead agency at The County of San Diego, a true menu of concerns from local property owners' viewpoints.

Below are our comments on specific subjects listed to be analyzed on the EIR (specifically the areas of the proposed Rugged Solar project)....

Ground Water

Our largest concern is in regard to the water wells in the immediate area of the proposed Rugged Site. A true assessment of the wells in the immediate area has not been completed, most predominately of which the closest property APN #611-091-02-00 is located 439 feet south of the pumping wells. According to the EIR there are three off-site residential wells have been identified within 2,700 feet of pumping Wells 6a and 6b (Dudek, 2013; GLA 2010; GLA 2012), this study did not include the water well located on the #611-091-02-00 parcel. The closest property contains an active and certified residential use water well, making it the closest active residential groundwater well to the project; directly contradicting the EIR report of 1,742 feet as the closest residential ground water well. The project wells 6a & 6b pull water directly from the same water table

used by the well located on parcel #611-091-02-00, negatively subjecting the residential/agricultural well to the usage of the project wells.

We would like to express our alarm for the water wells in the immediate area and any compromised integrity during and after the construction phase of the project. The ground vibration created from construction, drilling, pounding and installation methods for the CPV masts can have a detrimental effect on the integrity of the adjacent water wells.

Another concern is the leaching of ground water on and around the CPV 28" diameter metal poles into our water table and affecting the water quality in the existing well. What are the specifications of the metal masts that are inserted into the ground? Are the poles galvanized or coated to prevent oxidation over time into the soil and water table?

Zoning

The parcel #611-091-02-00 is the closest property to the Rugged Solar Project. According to the EIR the parcel (APN# 611-091-02-00) is non-residential, and undeveloped which is clearly not accurate. This property is zoned S92, it has been approved by the Health Department for residential development (3 bedroom home, and 330 leech line.) The land has been in development consisting of agricultural/residential improvements since 2010. The project will directly border this residential property. Why would the EIR provide false information in the report regarding this property?

We residents in the area are still feeling the impact of the County 2020 Plan. Allowing this rezoning requested within the Rugged project appears to go directly against the 2020 Plan. A zoning change to property once zoned S92 for this application should not be allowed it is now directly adjacent the proposed enormous power project's boundaries. In our opinion this project is "industrial" by nature and most other definitions and should be well separated from an owner's residential property.

Referring specifically to APN #611-091-02-00, this residential/agriculture zoned parcel will be severely impacted by the proposals of the Rugged project.

Easement

How will the proposed rugged project address the easement that is access from Ribbonwood Rd, to the residential parcel #611-091-02-00?

Storm Water Management (Run-off)

What measures will be taken to control water runoff from thunderstorm, rain, and snow melt? Will the soil stabilizer be able to maintain the massive run-off of graded land in flash flood conditions?

Wildfire Hazard

As stated in the EIR the Rugged Solar project falls within the Very High Fire Hazard Severity Zone. Has there been studies conducted to determine the heat around the solar panels, and the risk of combustion of the surrounding vegetative materials? Will the stored water be enough to combat a fire if one was to occur?

Due to the high probability of fire in the area of the proposed project, what are the predetermined plans for repair of the damage incurred by the fire?

If a fire was to be started by the project (construction, or future use alike) who will be held responsible for the damages inflicted, and the costs accrued to fight the fire?

Aesthetics (Visual Resources)

We are concerned with the proposed project's potential effects on visual resources in the Boulevard community; because the proposed project area is highly visible from the Interstate 8 freeway in east bound and west bound directions. Any passerby or resident will look down on a metaphorical "sea" panels that blanket the ground. The existing wind turbines that are the Kumeyaay Windfarm (and the newly proposed Tule Wind Project) already obstruct the views, and damage the aesthetics. The adverse environmental affects that the Rugged Solar Project will have to visual resources include visual character; how a viewer observes the visual environment as a whole; visual quality, the environment's brilliance, distinction, and/or excellence seen by the observer; viewers response from the highway the composite view is from the right-of-way;

the viewing distance is vast and extensive, the number of viewers will be high due to the extensive use of Interstate 8. The Sunrise Powerlink attempted to blend into their environment by coloring the towers. Will the poles of the CPV panels used in the Rugged project be painted, or colored, to fit in with the surroundings?

Air Quality (Dust Control)

In the Boulevard area, blowing winds are continuing occurrences; gusts frequently blow up to 70 miles per hour or more. Concerns arise not only during construction of the Rugged Acres Solar project, but also for the life of the project. Barren lands will include but not limited to, of area underneath the CPV panels, new and existing roadways, fire barriers, and access roads. These large exposed areas in combination with the unfailing wind, and dry conditions (annual precipitation of 15.84"), create a continuous particulate in the air affecting the surrounding area. The high impact of air quality will not be limited to the construction phase of the project.

Biological Resources

The proposed project area contains natural habitats with the potential for use by sensitive and/or protected species. This project creates the potential for substantial adverse effects through habitat modifications, including the invasive species. In the proposed area, any disrupted land is quickly taken and the native flora is pushed out; additionally any moisture in the soil is monopolized due to the adaptation of invasive species.

Boundaries

We feel there is dire necessity for the County to increase the proposed required set back distances from Rugged project fences and CPV panels/masts near adjacent neighbors water wells and property boundaries. This distance should be lengthened substantially when adjacent to a residential/agricultural (S92) zoned parcel. Without additional space from project fencing to an adjacent residential property boundary the tall masts and CPV panels will appear to "loom" intrusively over our boundaries. The Rugged project, the Kumeyaay Windfarm, Tule Wind projects, and the Sunrise Powerlink all encroach onto populated areas, our homes and Ranches. These projects have left us in the area

feeling as though we are being “stepped on.” Are we as local individuals, property owners, residents, and future residents obsolete and irrelevant?

Dark Skies and Glare

A concern arises with the reflective light from the CPV panel surfaces. Most of the proposed grids of high density panels on the Rugged project are situated in a highly visual valley. As these CPV panels follow the path of the sun, through the sky, the reflective light from the panels will be reflected on the southern and western horizons. Residential homes, ranches, yards, freeway traffic (potentially dangerous effects to travelers along HWY I-8 from the reflected light also could occur,) individuals, including children at local school bus stops, are all within view of these horizons, and will be negatively impacted from the reflected light of these CPV panels lenses.

There are homes that will be directly impacted by glare every day during the sunset. Limited duration of glare is not a solution to the fact that the home owners, and guests are visually negatively impacted by the afternoon.

The Laguna Observatory, as well as local star observers, have a clear direct view of the project area; will the reflected moon light impact the observatory adversely affecting their work?

Land Mitigation

Impacts to sensitive habitat should be mitigated through conservation of a habitat, as specified by the County. Any land used for mitigation should be protected for conservation, and a grant should be in place so that the mitigated land can be managed for all time.

Traffic

Can the existing and proposed roads (Ribbonwood Road and the proposed dirt road that will be used for ingress and regress) support the amount of traffic flow, construction traffic, and weight of the vehicles traveling these corridors? As residents in the area, we are especially concerned with condition of the existing asphalt of Ribbonwood Rd after the project is

concluded, and the how the land will be affected, during and after, the use of the proposed dirt Rugged project access road.

Wildlife Movement

There is an abundance of life in the proposed Rugged project area, with an array of animal species living in or using the area for movement. Concerns arise with the seven foot high, barbed wire fences that will incase the entire area, limiting the valley's use as a wildlife habitat and a wildlife corridor.

Project Alternatives

Please consider the complete removal of the proposed Rugged section from the project.

Thank you for the opportunity to comment on the EIR for the proposed project.